

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

U.S. DISTRICT COURT
DISTRICT OF MAINE
PORTLAND
RECEIVED & FILED

2025 JUN 27 P 2:39

Nathan Reardon,)
Plaintiff,)
)
v.) Civil Action No. _____
)
Federal Bureau of Prisons,)
Defendant.)

DEPUTY CLERK

COMPLAINT FOR DECLARATORY AND INJUNCTIVE
RELIEF
UNDER THE ADMINISTRATIVE PROCEDURE ACT

JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1331 and 5 U.S.C. §§ 702–706.
2. Venue is proper in the District of Maine under 28 U.S.C. § 1391(e) because Plaintiff resides in this district and the acts or omissions giving rise to the claims occurred in this district.

PARTIES

3. Plaintiff Nathan Reardon is a U.S. citizen residing in Detroit, Maine. He was in federal custody from April 20, 2022, to May 30, 2023, including incarceration at Hancock County Jail and a federal prison camp.
4. Defendant Federal Bureau of Prisons is an agency of the United States government responsible for the custody and management of federal prisoners.

FACTUAL ALLEGATIONS

5. Plaintiff was classified as a “Minimum Risk” inmate under the PATTERN assessment system.
6. Plaintiff participated fully in all available programming and activities throughout his incarceration.
7. Despite this, the BOP failed to award Plaintiff any First Step Act (FSA) Time Credits between April 20, 2022 and November 2022 while held at Hancock County Jail.

8. From December 2022 to May 2023, while at a minimum security federal prison camp, Plaintiff remained minimum-risk and continued full program participation.

9. BOP did not award Plaintiff the full amount of FTCs earned, and improperly denied or delayed halfway house and home confinement placements.

10. Plaintiff was granted only 3 weeks of prerelease custody, despite eligibility for over 10 months under the FSA.

11. After a probation violation, Plaintiff received no halfway house placement at all, despite renewed eligibility.

CLAIM FOR RELIEF – APA VIOLATIONS

12. Defendant's failure to apply earned time credits violates 5 U.S.C. § 706(1) as agency action "unlawfully withheld or unreasonably delayed."

13. Defendant's policies and practices in denying or deferring FTCs and prerelease custody constitute agency action that is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law," in violation of 5 U.S.C. § 706(2).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

A. Declare that BOP violated the APA by unlawfully withholding and delaying application of FTCs;

B. Declare that Plaintiff is entitled to retroactive application of FSA Time Credits earned from April 2022 to May 2023;

C. Order BOP to correct Plaintiff's record and provide appropriate sentence adjustments and acknowledgment of miscalculated FTCs;

D. Award costs and any other relief the Court deems just and proper.

Dated: June 16, 2025

Respectfully submitted,


Nathan Reardon

PO Box 52

Detroit, ME 04929

207-745-7575

nathan@membershipauto.com